

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

|                          |   |                   |
|--------------------------|---|-------------------|
| In re:                   | ) | Case No. 24-80617 |
|                          | ) | (Chapter 11)      |
| C M HEAVY MACHINERY, LLC | ) |                   |
|                          | ) |                   |
| Debtor.                  | ) |                   |
|                          | ) |                   |

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**NOTICE CLARIFYING SCOPE OF  
RELIEF REQUESTED IN CLOSING ARGUMENT**

Comes now C M Heavy Machinery, LLC (“CMHM” or the “Debtor”), by and through undersigned counsel, and submits this notice clarifying the scope of relief requested in its written closing argument filed on May 1, 2025 (DE #168), and states as follows:

In the “WHEREFORE” clause of its written closing, the Debtor inadvertently included a request for denial of the United States Trustee’s Motion to Convert Case to Chapter 7, (the “UST Motion,” as found at DE #147). That reference was not intended to request immediate adjudication of the UST Motion.

As reflected in the parties’ stipulation filed on April 1, 2025 (DE #153), the Debtor and the United States Trustee have agreed that the UST Motion will be heard contemporaneously with any confirmation hearing on the Debtor’s proposed Chapter 11 plan.

Accordingly, the Debtor submits this notice to clarify that the only matter presently under advisement is Creditor Great Plains National Bank’s Motion to Convert or Dismiss (DE #82), as tried during the evidentiary hearing concluded on April 9, 2025. The Debtor preserves its opposition to the UST Motion, which will be addressed at the time of plan confirmation pursuant to the parties’ stipulation.

*[Signature on Following Page]*

Respectfully Submitted,

Dated: May 5, 2025

By: /s/ Maurice B. VerStandig  
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*Counsel for the Debtor*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5th day of May 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Christianna A. Cathcart  
Christianna A. Cathcart